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President
Newport, Vermont

Charles B. Meeks
Executive Director
Alexandria, Virginia



NATIONAL SHERIFFS' ASSOCIATION

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August 15, 1994

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The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Opposition to Billed Party Preference
CC Docket No. 92-77

Dear Chairman Hundt:

The National Sheriffs' Association has over 21,000 members nationwide. Our membership is comprised of public officials who are responsible for crime control and prevention at the county level. Sheriffs process thousands of arrests on any given day, and are responsible for detaining in our jails thousands of inmates nationwide.

We are writing to inform you that we are deeply troubled over the FCC's billed party preference (BPP) proposal. We believe that BPP would threaten our ability to provide telephone equipment specifically for inmate use.

A large number of our members' jail facilities are located in rural areas of the country. These facilities often fall within the service territory of small, independent telephone companies, as well as Bell systems that include rural areas. Many of our members can attest to the fact that the telephone companies servicing their facilities do not currently offer inmate phone equipment. That equipment is currently provided by the private inmate phone provider industry.

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Chairman Hundt

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It should be no secret that BPP will destroy the private inmate phone provider industry. Our sheriffs could not afford to purchase this equipment out of their general budgets. Why should taxpayers fund inmate telephone systems?

We think the adverse impact that BPP will have on inmate calling is clear. Our sheriffs will be forced to control inmate calling through the methods we used before private competition (i.e. by strictly limiting calling times and by requiring continuous supervision of inmate calls by a deputy.

We believe the majority of sheriffs are sensitive to the rates families pay for inmate calls. If the FCC is concerned that there are certain providers that are nevertheless charging unreasonable rates, the FCC should use its enforcement powers to directly regulate the rates of those providers. Firm rate guidance by the FCC would provide a legal benchmark for sheriffs to use in enforcing rate compliance.

The National Sheriffs' Association endorses fair and reasonable rates for inmate calls and would expect all sheriffs to require service providers to adhere to FCC rate guidelines. It would be entirely counterproductive, however, to attempt to regulate inmate calling rates through a proposal that will ultimately reduce inmate calling opportunities. On behalf of our membership, therefore, we must oppose BPP.

Sincerely,



Charles "Bud" Meeks
Executive Director



CHARLES "BUD" MEEKS
EXECUTIVE DIRECTOR

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